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Co-Lead Class Counsel

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

GORDON AND MARY FELLER, et
al.,

Plaintiffs,

vs.

TRANSAMERICA LIFE
INSURANCE COMPANY,

Defendant.

Case No. 16-cv-01378 CAS (AJWx)

CLASS ACTION

**NOTICE OF MOTION AND MOTION
FOR FINAL CERTIFICATION OF
SETTLEMENT CLASS AND FINAL
APPROVAL OF PROPOSED
NATIONWIDE CLASS SETTLEMENT
AGREEMENT**

Hearing Date: January 28, 2019

Hearing Time: 12:00 p.m. (Noon)

Courtroom: 8D – 8th Floor

Judge: Hon. Christina A. Snyder

1 PLEASE TAKE NOTICE that on January 28, 2019 at 12:00 pm (noon), in
2 the courtroom of the Honorable Christina A. Snyder of the United States District
3 Court of the Central District of California, located at 350 W. First Street, Courtroom
4 8D, 8th Floor, Los Angeles, CA 90012, Settlement Class Counsel will and hereby
5 do move the Court for an order:

6 1. Finally certifying the Settlement Class pursuant to Fed. R. Civ. P.
7 23(a), (b)(2) and (b)(3), *Federal Rules of Civil Procedure*;

8 2. Finding that the Notice Program has been adequate and reasonable, has
9 met the requirements of Rule 23, and has constituted the best notice practicable
10 under the circumstances;

11 3. Granting final approval of the proposed Settlement pursuant to Fed. R.
12 Civ. P. 23(e); and

13 4. Directing the entry of Final Judgment, dismissing the Action
14 (including all individual and Class claims presented thereby) on the merits with
15 prejudice.

16 This Motion is based on (i) this Notice of Motion and Motion; (ii) the
17 Memorandum in Support of Motion for Final Certification of Settlement Class and
18 Final Approval of Proposed Nationwide Class Settlement Agreement; (iii) the Joint
19 Declaration of Co-Lead Class Counsel in Support of Plaintiffs' Motion for Final
20 Approval of Class Action Settlement and For an Award of Attorneys' Fees,
21 Expenses, and Service Awards; (iv) the Declaration of Jason M. Stinehart of Rust
22 Consulting Regarding Notification To The Class (Dkt. 449); and (v) the Court's file
23 in this case.

1 Dated: December 13, 2018.

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3 **BONNETT FAIRBOURN FRIEDMAN**
4 **& BALINT, P.C.**

5 /s/ Andrew S. Friedman

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